

# **EXHIBIT B**

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**From:** Jacobs, Michael A. [mailto:[MJacobs@mofo.com](mailto:MJacobs@mofo.com)]

**Sent:** Tuesday, March 14, 2017 5:42 PM

**To:** Jordan Jaffe <[jordanjaffe@quinnemanuel.com](mailto:jordanjaffe@quinnemanuel.com)>

**Cc:** Charles K Verhoeven <[charlesverhoeven@quinnemanuel.com](mailto:charlesverhoeven@quinnemanuel.com)>; David Perlson <[davidperlson@quinnemanuel.com](mailto:davidperlson@quinnemanuel.com)>; Gonzalez, Arturo J. <[AGonzalez@mofo.com](mailto:AGonzalez@mofo.com)>

**Subject:** Re: [EXT] RE: Waymo v. Uber

Message acknowledged. Thanks.

On Mar 14, 2017, at 5:41 PM, Jordan Jaffe <[jordanjaffe@quinnemanuel.com](mailto:jordanjaffe@quinnemanuel.com)> wrote:

Michael,

The sealed documents are here: [Unsealed Preliminary Injunction](#)

Best regards,

**Jordan R. Jaffe // Quinn Emanuel // 415.498.0556 // [jordanjaffe@quinnemanuel.com](mailto:jordanjaffe@quinnemanuel.com)**

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**From:** Jacobs, Michael A. [mailto:[MJacobs@mofo.com](mailto:MJacobs@mofo.com)]

**Sent:** Tuesday, March 14, 2017 5:02 PM

**To:** Charles K Verhoeven <[charlesverhoeven@quinnemanuel.com](mailto:charlesverhoeven@quinnemanuel.com)>

**Cc:** David Perlson <[davidperlson@quinnemanuel.com](mailto:davidperlson@quinnemanuel.com)>; Jordan Jaffe <[jordanjaffe@quinnemanuel.com](mailto:jordanjaffe@quinnemanuel.com)>; Gonzalez, Arturo J. <[AGonzalez@mofo.com](mailto:AGonzalez@mofo.com)>

**Subject:** Re: [EXT] RE: Waymo v. Uber

Consider the below message sent. (I am remote.)

On Mar 14, 2017, at 5:00 PM, Charles K Verhoeven <[charlesverhoeven@quinnemanuel.com](mailto:charlesverhoeven@quinnemanuel.com)> wrote:

Sorry, was in meeting. Yes, that works. Send me the mail and I will direct the docs immediately.

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**From:** Jacobs, Michael A. [mailto:[MJacobs@mofo.com](mailto:MJacobs@mofo.com)]

**Sent:** Tuesday, March 14, 2017 4:59 PM

**To:** Charles K Verhoeven <[charlesverhoeven@quinnemanuel.com](mailto:charlesverhoeven@quinnemanuel.com)>

**Cc:** David Perlson <[davidperlson@quinnemanuel.com](mailto:davidperlson@quinnemanuel.com)>; Jordan Jaffe <[jordanjaffe@quinnemanuel.com](mailto:jordanjaffe@quinnemanuel.com)>; Gonzalez, Arturo J. <[AGonzalez@mofo.com](mailto:AGonzalez@mofo.com)>

**Subject:** Re: [EXT] RE: Waymo v. Uber

Charlie?

On Mar 14, 2017, at 3:05 PM, Jacobs, Michael A. <[MJacobs@mofo.com](mailto:MJacobs@mofo.com)> wrote:

Charlie, I have modified your language below (see yellow highlighting) to further minimize misunderstanding.

Michael

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**From:** Charles K Verhoeven [<mailto:charlesverhoeven@quinnmanuel.com>]

**Sent:** Tuesday, March 14, 2017 3:03 PM

**To:** Jacobs, Michael A.

**Cc:** David Perlson; Jordan Jaffe; Gonzalez, Arturo J.

**Subject:** [EXT] RE: Waymo v. Uber

Michael,

To clarify, what we have proposed is that Defendants agree that the confidential portions of the PI motion will be treated as "HIGHLY CONFIDENTIAL – ATTORNEYS' EYES ONLY" material pursuant to the Northern District of California's Patent Local Rule 2-2 Interim Model Protective Order, with the exception that individuals in Section 7.3(b) are excluded from those to whom Defendants may disclose "HIGHLY CONFIDENTIAL – ATTORNEYS' EYES ONLY" material **pending further agreement or court order.** I think this consistent with what you have proposed below, but just didn't want there to be any misunderstanding. We also agree that acceptance of our papers on this basis will be without prejudice to Defendants' position on in-house counsel. Assuming the above is acceptable, we will pass along the papers.

Charlie

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**From:** Jacobs, Michael A. [<mailto:MJacobs@mofo.com>]

**Sent:** Tuesday, March 14, 2017 2:26 PM

**To:** Charles K Verhoeven <[charlesverhoeven@quinnmanuel.com](mailto:charlesverhoeven@quinnmanuel.com)>

**Cc:** David Perlson <[davidperlson@quinnmanuel.com](mailto:davidperlson@quinnmanuel.com)>; Jordan Jaffe <[jordanjaffe@quinnmanuel.com](mailto:jordanjaffe@quinnmanuel.com)>; Gonzalez, Arturo J. <[AGonzalez@mofo.com](mailto:AGonzalez@mofo.com)>

**Subject:** Waymo v. Uber

Charlie,

Thanks for the call today.

In connection with receiving unredacted versions of your filing, we agree that we will maintain those materials on an outside-counsel only basis until further agreement or order of the Court.

We believe the Patent Local Rule 2-2 Interim Model Protective Order applies; we understand that you disagree; neither of us is waiving any rights.

Michael

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**From:** Charles K Verhoeven [<mailto:charlesverhoeven@quinnmanuel.com>]

**Sent:** Tuesday, March 14, 2017 1:48 PM

**To:** Jacobs, Michael A.

**Cc:** David Perlson; Jordan Jaffe; Gonzalez, Arturo J.

**Subject:** RE: [EXT] Call Today?

415-875-6301

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**From:** Jacobs, Michael A. [<mailto:MJacobs@mofo.com>]

**Sent:** Tuesday, March 14, 2017 12:21 PM

**To:** Charles K Verhoeven <[charlesverhoeven@quinnmanuel.com](mailto:charlesverhoeven@quinnmanuel.com)>

**Cc:** David Perlson <[davidperlson@quinnmanuel.com](mailto:davidperlson@quinnmanuel.com)>; Jordan Jaffe <[jordanjaffe@quinnmanuel.com](mailto:jordanjaffe@quinnmanuel.com)>; Gonzalez, Arturo J. <[AGonzalez@mofo.com](mailto:AGonzalez@mofo.com)>

**Subject:** RE: [EXT] Call Today?

Charlie,

Understood. We can talk at 2 p.m. today then. Please let us know the number to call.

Michael

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**From:** Charles K Verhoeven [<mailto:charlesverhoeven@quinnmanuel.com>]

**Sent:** Tuesday, March 14, 2017 12:08 PM

**To:** Jacobs, Michael A.

**Cc:** David Perlson; Jordan Jaffe; Gonzalez, Arturo J.

**Subject:** RE: [EXT] Call Today?

Michael,

On the PO issue, tomorrow at 11:30 would be bad for us because we are required to send our letter-response within ½ hour of that time. Could we just schedule a short call today to try and make progress on that? Also, on the expedited discovery issue, I was hoping we could simply discuss Defendants' position on whether they would agree to work with us to schedule bilateral discovery in principle. We could send a detailed proposal in writing later today and have a call tomorrow at 11:30 about that.

Again, I am available at your convenience this afternoon for a short call.

Charlie

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**From:** Jacobs, Michael A. [<mailto:MJacobs@mofo.com>]

**Sent:** Tuesday, March 14, 2017 11:53 AM

**To:** Charles K Verhoeven <[charlesverhoeven@quinnmanuel.com](mailto:charlesverhoeven@quinnmanuel.com)>

**Cc:** David Perlson <[davidperlson@quinnmanuel.com](mailto:davidperlson@quinnmanuel.com)>; Jordan Jaffe <[jordanjaffe@quinnmanuel.com](mailto:jordanjaffe@quinnmanuel.com)>; Gonzalez, Arturo J. <[AGonzalez@mofo.com](mailto:AGonzalez@mofo.com)>

**Subject:** RE: [EXT] Call Today?

Charlie,

Thanks. We are working on both issues. We will be prepared and available to talk at 11:30 tomorrow. Hope that works for you.

Michael

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**From:** Charles K Verhoeven [<mailto:charlesverhoeven@quinnmanuel.com>]

**Sent:** Tuesday, March 14, 2017 11:34 AM

**To:** Jacobs, Michael A.; Gonzalez, Arturo J.

**Cc:** David Perlson; Jordan Jaffe

**Subject:** [EXT] Call Today?

Mike,

Given the Court's orders and hearing this Thursday, I suggest it would make sense for us to have a call today concerning the outstanding PO and expedited discovery issues to see if we can reach agreement. I am available this afternoon. How about 2:00? If that does not work, is there another time you are available for a call today?

Best Regards,

Charlie

Charles K. Verhoeven  
Head of Northern California Offices  
Quinn Emanuel Urquhart & Sullivan, LLP  
50 California Street, 22nd Floor  
San Francisco, CA 94111  
Main Phone: (415) 875-6600  
Main Fax: (415) 875-6700  
E-mail: [charlesverhoeven@quinnmanuel.com](mailto:charlesverhoeven@quinnmanuel.com)  
Web: [www.quinnmanuel.com](http://www.quinnmanuel.com)

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